



CITY OF OREM
DEPARTMENT OF DEVELOPMENT SERVICES

July 11, 2008

Mr. Merrell Jolley, PE
UDOT, Region 3
658 North 1500 West
Orem, UT 84057

RE: I-15, Utah County – Salt Lake County Final Environmental Impact Statement (FEIS) Comments

Dear Merrell:

This letter addresses concerns that we have with the Final Environmental Impact Statement and Section 4(f) Evaluation for the I-15 Corridor, Utah County – Salt Lake County project dated June 2008 (here after referred to as FEIS). Before doing that, we desire to express appreciation for your efforts and the efforts of the other transportation officials from UDOT and your consultants. You have been and continue to be helpful and thoughtful in working towards positive solutions for our concerns. We are thankful for UDOT's on-going efforts in keeping the City and our citizens informed and addressing their concerns.

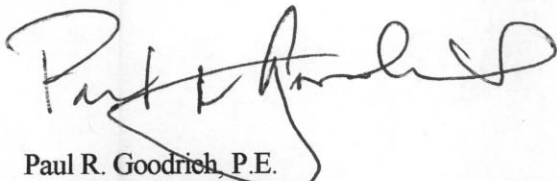
Orem City respectfully submits the following concerns with the FEIS document:

1. Orem City requests UDOT review the Cities DEIS documented concerns from January 2008 (Attachment A – Mayor Washburn letter). The only thing that has changed is that we support UDOT's decision for Option "D" verses Option "A". Appendix "D" of the FEIS does not include responses to all of the concerns expressed in Mayor Washburn's letter.
2. Several of the I-15 crossings are inconsistent with Orem City's adopted Resolution R-07-0023 (see Attachment A of Attachment A - Mayor Washburn letter). We appreciate the comments in the Appendix on page D-20, and D-21 that, "all proposed crossings will be coordinated with Orem City to ensure that structures can accommodate roadway widths as adopted by the Orem City Council". In the main body of the FEIS the concept designs do not show bridge structures wide enough to accommodate our Transportation Master Plan. We request that UDOT indicate in the main body of the document that all I-15 bridge structures need to be wide enough to accommodate adopted right-of-way widths in Orem over/under I-15, including:
 - 1600 North (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-058)
 - 1200 North (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-057)
 - 800 North (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-056)
 - 400 North (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-055)
 - Center Street (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-054)
 - 400 South (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-053D)
 - University Parkway (Vol II, Section: Option D, Sheet: HWY-051D, HWY-051.1D), and
 - 2000 South (Vol II, Section: Option D, Sheet: HWY-049D)

3. UDOT held a 1200 West Center Street Neighborhood meeting on March 18, 2008, where the southeast quadrant neighborhood expressed that they did not want a connection to the new 1200 West alignment. Staff expressed concerns that this proposal for no connection from 45 South and 80 South to 1200 West was not acceptable. The existing grade of 40 South connecting to 1000 West is very steep and already difficult to maneuver in winter conditions and not providing a connection to 1200 West creates long (over 1,000 feet) dead-end roadway(s) that are not compliant with Orem City Code or International Fire Codes (see Attachment B).
4. New Development areas north of 800 North near I-15 have projected the need for future dual left-turn lanes at 1200 West. Staff has provided copies of the CAD file illustrating the proposed intersection widening to UDOT, but the proposed design in Volume II, Central Utah County (Common Area), Sheet HWY-056.1 appears to be too narrow to accommodate the eastbound dual left-turn lanes (Attachment C).
5. Orem City has received several concerns from residents and business owners along Sandhill Road that there are no sound walls shown in the document for the area from 2000 South to University Parkway (Attachment D). We suggest that further studies be conducted in this area, and that the study area include mitigating noise impacts to our City Park. Orem City reiterates our desire and support for full sound walls along I-15 to mitigate impacts to throughout the entire City.
6. We have concerns over the dramatic change in the illustrated design of the Option D Flyover at University Parkway between the Draft Environmental Impact Statement (DEIS) with three travel lanes in each direction east of I-15 (Attachment E) that in the FEIS has been re-designed to two eastbound travel lanes before picking up the Flyover as the third lane east of Sandhill Road (Attachment F).
7. We also have concerns over the dramatic changes in the street volumes and level of service conditions in Tables 2.6, 2.7 and 2.8 between the DEIS (Attachment G) and FEIS (Attachment H) documents.

Thank you for supporting our comments in regard to this I-15 FEIS. City staff appreciates the opportunity to work with UDOT and FHWA on this I-15 reconstruction project. We fully understand that this project is a huge undertaking for all agencies involved, and the anticipated benefits of reconstructing I-15 will have many significant and positive impacts for Orem City and our residents.

Sincerely,



Paul R. Goodrich, P.E.
Transportation Engineer

Attachments



CITY OF OREM
OFFICE OF THE MAYOR

January 10, 2008

Mr. Carlos Machado, MBA
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118

Mr. Merrell Jolley, PE
Utah Department of Transportation
658 North 1500 West
Orem, UT 84057

RE: I-15 Draft Environmental Impact Statement (DEIS) Comments

Dear Carlos and Merrell:

Orem City respectfully submits the following comments for the Utah Department of Transportation (UDOT) I-15 DEIS. Our City staff presented the following comments below to our City Council on January 8, 2008, with the session opened for public comment, and received unanimous approval by all Council members. Our City staff has prepared an additional detailed letter (attached) that explains our concerns below in greater detail.

1. Many of the I-15 over/under street crossings may not be wide enough to accommodate Orem City's desired future right-of-way widths as adopted by our City Council.
2. We would like to explore an overpass versus an underpass option with the proposed 1200 North roadway crossing.
3. We support full sound walls along the I-15 corridor AND the frontage roads.
4. We support Alternative 4, Option A (800 South Interchange and Frontage Road System). However, we would like a slip ramp to UVSC crossing under University Parkway connecting to the southern end of the campus drive.
5. The new 800 South Interchange alignment west of I-15 needs to be shifted further north in order to provide additional parking stalls for the proposed Intermodal Center.
6. We request that UDOT provide a relocated railroad crossing for access to the properties along 800 South between the railroad tracks and the west side of I-15 corridor. We would like the relocated crossing to connect at the northern portion of the proposed Intermodal Center site.

January 10, 2008

Mr. Carlos Machado, MBA &

Mr. Merrell Jolley, PE

Page 2

7. We have concerns about the skewed angle of the proposed 1200 West realignment at Center Street, the new residential street connections south of Center Street on 1200 West, and the alignment of Center Street west of I-15. We would like to explore a more southern alignment shift of Center Street west of I-15 so the northern properties, including but not limited to 231, 156 and 108, are less impacted by the reconstruction of the interchange.
8. We have concerns about the 2000 South connections with the proposed frontage road system being too close to the two existing at-grade railroad crossings west of I-15. We would like to explore grade separated railroad crossing options with UDOT.
9. We would like UDOT to reconsider the location of the frontage road access point on Sandhill Road by possibly moving it further to the north.
10. Please clarify the future 2030 traffic volumes for Alternative 1 (No-Build) and Alternative 4, Options A, B, C, and D that are presented in Chapter 2, Sections 2.4 and 2.5. It also appears that future 2030 traffic volumes for Sandhill Road are missing from the report. Please provide future 2030 Alternative 1 (No-Build) and Alternative 4, Options A, B, C and D traffic volumes for Sandhill Road from 1740 North to University Parkway.

Please accept these comments into your I-15 DEIS. Orem City appreciates the opportunity to provide input towards this I-15 reconstruction project. We fully understand that this project is a huge undertaking for all agencies involved and the benefits of reconstructing I-15 will be of great significance for Orem City residents.

Sincerely,



Jerry C. Washburn
Mayor



CITY OF OREM

DEPARTMENT OF DEVELOPMENT SERVICES

January 10, 2008

Jim Reams, City Manager
City of Orem

RE: I-15, Utah County – Salt Lake County Draft Environmental Impact Statement (DEIS) Comments

Dear Jim:

This letter addresses some specific concerns Orem Staff have with the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the I-15 Corridor, Utah County – Salt Lake County project dated November 2007 (here after referred to as DEIS). Before doing that, we desire to express several things:

We appreciate the efforts of Merrell Jolley, PE, and the other transportation officials from UDOT and their consultants. They have been very helpful, positive and thoughtful about our concerns and recommendations. We appreciate the efforts of Nick Jones, PE, and his staff at Provo City. We have had differences of opinion in the past about I-15 and city street functions adjacent to I-15, but were able to find common ground and present recommendations to UDOT which we felt were in the best overall interests of neighbors in both cities. We express our appreciation to the Orem and Provo City Councils for their desires to be educated about I-15 issues and unite their efforts in city adopted resolutions as messages to UDOT. Finally, we express thanks to the many concerned property owners/citizens we have been able to work with concerning this project. We look forward, with a positive outlook, to the on-going effort to keep our citizens involved as we work with UDOT on the final design and construction issues of I-15.

The current proposed DEIS represents a process that began about five years ago. Millions of dollars and thousands of man hours have been spent to get to this point in time since UDOT completed the Concept I-15 Corridor Plan study that was performed by Carter & Burgess in 2002. City staff has been actively involved in every step of the process and recommends City Council accept this DEIS with the following comments:

1. It appears 2000 South, at the connection with the Frontage Road System (Volume II, Option A, Sheet: HWY-049A) does not meet Orem City's desired 5-lane right-of-way width consistent with Orem City's Resolution R-07-0023 (Attachment A). Other I-15 street crossings also appear not to be wide enough to accommodate desired right-of-way widths. City staff requests UDOT work closely with us to ensure all I-15 bridge structures are wide enough to accommodate adopted future right-of-way widths for street crossings over/under I-15, including:

- 1600 North (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-058)
 - 1200 North (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-057)
 - 800 North (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-056)
 - 400 North (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-055)
 - Center Street (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-054)
 - 400 South (Vol II, Section: Central Utah County (Common Area), Sheet: HWY-053A)
 - 800 South (Vol II, Section: Option A, Sheet: HWY-052A)
 - University Parkway (Vol II, Section: Option A, Sheet: HWY-051A), and
 - 2000 South (Vol II, Section: Option A, Sheet: HWY-049A)
2. We desire the new proposed 1200 North roadway crossing to be an overpass rather than an underpass as illustrated in Volume II, Section: Central Utah County (Common Area), Sheet: HWY-057 (Attachment B).
 3. We support full sound walls along I-15 AND the frontage roads to mitigate noise impacts to residential areas.
 4. We support the full widening and reconstruction of I-15 in Alternative 4, Option A (Vol II, Section: Option A), including a two-lane, one-way frontage road system from University Parkway in Orem to Center Street in Provo. However, we would request Option A to include a Frontage Road slip ramp to UVSC crossing under University Parkway connecting to the southern end of the campus drive, similar to Option D illustrated in Volume II, Section: Option D, Sheet: HWY-051D (Attachment C).
 5. We support Option A with the new proposed 800 South Interchange north of the University Parkway Interchange as illustrated in Volume II, Section: Option A, Sheets: HWY-051.3A, HWY-052A, HWY-052.1A, and HWY-053, but requests UDOT to consider a new preferred alignment that would shift the new 800 South Interchange roadway on the west side of I-15 further to the north (Attachment D).

Shifting the new roadway alignment further north will allow for greater signal separation for the existing traffic signal at 1000 South on Geneva Road and the new proposed traffic signal at the intersection of Geneva Road and the new 800 South alignment. Greater traffic signal separation on Geneva Road is extremely desirable, especially with the Geneva Road EIS near completion and indicating that Geneva Road will need to be reconstructed to a 7-lane arterial in this area. Shifting the 800 South roadway alignment for the proposed interchange further north will also allow for larger amounts of the adjacent properties to be redeveloped. The new roadway alignment in Attachment D will also assist in providing a more feasible connection to the proposed Intermodal Center and Commuter Rail Station that is being studied near the UVSC property immediately south of the residential properties bordering 800 South. Presently the Utah Transit Authority (UTA) is proposing approximately 520 parking stalls for the station, but Orem City and UTA are in agreement that 1,000 parking stalls would be more desirable. If the 800 South alignment was shifted further north, UTA could provide the additional 500 stalls through the residential properties, and maintain vacant property for additional redevelopment that would help vitalize the station and nearby Parkway Crossing projects (Attachment E).

6. We have an existing railroad crossing on 800 South between Geneva Road and the I-15 corridor. In Volume II, Section: Option A, Sheet: HWY-051.3A (Attachment F), the existing 800 South roadway is proposed to knuckle at 1370 West, just west of the railroad tracks. However, the property south of the existing 800 South roadway on the east side of the railroad tracks will not be accessible without an improved railroad crossing. We would suggest UDOT improve the existing 800 South roadway by realigning the road slightly south and providing a relocated railroad crossing and connection to the northern parking lot area of the proposed Intermodal Center. We would also like to work closely with UDOT in designing a connection that would be feasible in maintaining access to the property south of the existing 800 South roadway between the railroad tracks and the I-15 corridor.
7. We also have concerns about the skewed angle of the proposed realignment of 1200 West at Center Street and the new residential street connections south of Center Street on 1200 West. We would also like UDOT to explore a more southern alignment shift of Center Street west of I-15 so that the northern properties, including but not limited to 231, 156 and 108, are less impacted by the reconstruction of the existing Center Street Interchange to the new proposed Single Point Urban Interchange (SPUI) configuration, as illustrated in Volume II, Section: Central Utah County (Common Area), Sheet: HWY-054 (Attachment G). We would like to work closely with UDOT with this project in designing the new 1200 West alignment and a new southern alignment of Center Street west of I-15.
8. We have concerns about the 2000 South connections with the proposed frontage road system being too close to the two existing at-grade railroad crossings west of I-15. We would like to explore grade separated railroad crossing options with UDOT.
9. We would like UDOT to reconsider the location of the frontage road access point on Sandhill Road by possibly moving it further to the north, see Volume II, Section: Option A, Sheets: HWY-049A and HWY-050A (Attachments H and I). We have new higher density developments being approved and constructed along the west side of Sandhill Road just south of 1600 South that are not illustrated in the DEIS document. Perhaps the frontage road access point could be placed near 1600 South to lessen impacts to the single family residential areas further south on Sandhill Road.
10. Please clarify how the future 2030 traffic volumes were calculated for Alternative 1 (No-Build) and Alternative 4, Options A, B, C, and D, as illustrated in Chapter 2, Sections 2.4 and 2.5. Intuitively, with Sandhill Road becoming disconnected to 1740 North and a new frontage road interchange being proposed there, we feel that traffic volumes on 2000 South should not increase between Sandhill Road and Main Street in Alternative 4, Option A, but instead decrease. Other North/South and East/West traffic volumes presented in Tables 2-6 and 2-7 on pages 2-45 through 2-47 of the document also do not appear to make sense (Attachments J and K). We also notice that future 2030 traffic volumes for Sandhill Road appear to be missing from the report entirely. Please provide future 2030 traffic volumes on Sandhill Road from 1740 North to University Parkway for Alternative 1 (No-Build) and Alternative 4, Options A, B, C, and D.

Thank you for supporting our comments in regard to this I-15 DEIS. City staff appreciates the opportunity to work with UDOT and FHWA on this I-15 reconstruction project. We fully understand that this project is a huge undertaking for all agencies involved, but the anticipated benefits of reconstructing I-15 will have many significant and positive impacts for Orem City and our residents.

Sincerely,

K. Ed Gifford, P.E.
City Engineer

Paul R. Goodrich, P.E.
Transportation Engineer

Note: Attachments B through K of this letter have been removed from this new pdf document. Please advise if the attachments are needed and Staff will re-send them.

RESOLUTION NO. R-07-0023

A RESOLUTION OF THE CITY COUNCIL OF OREM,
UTAH, ADOPTING A NEW STREET CLASSIFICATION
MAP AS PART OF THE CITY TRANSPORTATION
MASTER PLAN

WHEREAS recorded and projected growth in the City of Orem and in Utah County has created the need for several transportation improvements in the city which are not identified in the City's 2001 Street Classification Map or City Transportation Master Plan; and

WHEREAS the City of Orem Transportation Advisory Commission recommends changes to the Street Classification Map and City Transportation Master Plan as shown on Exhibit "A", and Exhibit "B" and,

WHEREAS the primary proposed changes to the Street Classification Map and City Transportation Master Plan are as follows:

- Define principal arterials as streets that have or are intended to have seven lanes instead of five to seven lanes.
- Designate that minor arterials that cross I-15 shall have or are intended to have five lanes instead of three to five lanes.
- 1600 North from Geneva Road to 1200 West – upgrade from a minor arterial to a principal arterial.
- 1200 North from Geneva Road to 1200 West – upgrade from an urban collector to a minor arterial and identify that 1200 North shall be designed to cross I-15.
- Center Street from Geneva Road to 1200 West – upgrade from a Minor Arterial to a Principal Arterial.
- 400 South from Geneva Road to 1200 West – upgrade from an urban collector to a minor arterial.
- 800 South from Geneva Road to 900 West – upgrade from an urban collector to a minor arterial and identify that 800 South should cross I-15 at a new interchange point.
- 2000 South from Geneva Road to Sandhill Road – upgrade from an urban collector to a minor arterial.
- Add I-15 frontage roads from University Parkway southward into Provo.
- Remove the "urban collector to local" street classifications

- New or improved crossings of I-15 shall be designed with separate pedestrian and bicycle pathways.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF OREM, UTAH, as follows:

1. The City of Orem hereby adopts the June 2007 Street Classification Map as detailed in Exhibit "A" and Exhibit "B" as a part of the City Transportation Master Plan.
2. This resolution will take effect immediately upon passage.
3. All other resolutions, ordinances, and policies in conflict herewith, either in whole or in part, are hereby repealed.

PASSED and APPROVED this 26th day of **June** 2007.



ATTEST:

Donna R. Weaver
Donna R. Weaver, City Recorder

Jerry C. Washburn
Jerry C. Washburn, Mayor

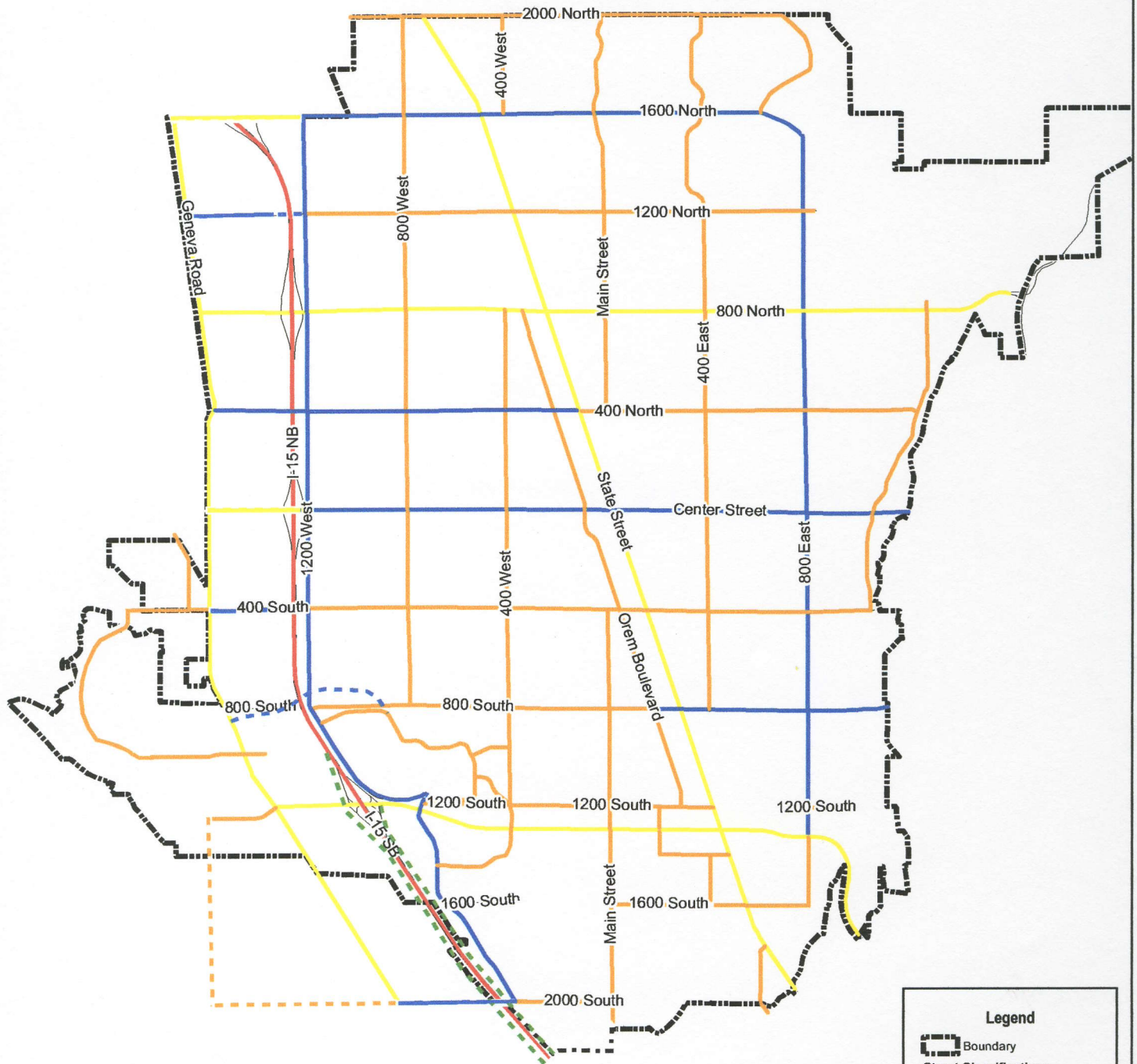
COUNCIL MEMBERS VOTING "AYE"

Margaret Black
Les Campbell
Dean Dickerson
Karen McCandless
Mark Seastrand
Shiree Thurston
Jerry C. Washburn

COUNCIL MEMBERS VOTING "NAY"

Street Classification Map

June 26, 2007



New or Improved I-15 Crossings with
Pedestrian & Bicycle Facilities

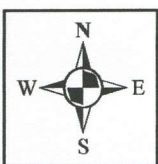


Exhibit “B”

Orem Street Nomenclature and Classification Guidelines

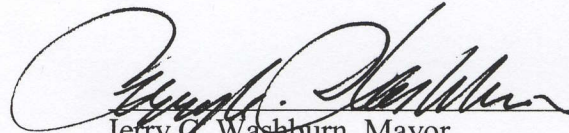
June 26, 2007

Orem Street Nomenclature Changes	
2007 Nomenclature	2001 Nomenclature
Interstate	Interstate
Principal Arterial	Principal Arterial
Minor Arterial	Minor Arterial
Urban Collector	Urban Collector
Local	Local

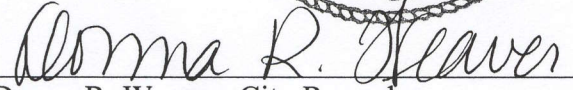
Orem Street Classification Guidelines				
Street Classification	Maximum Average Daily Traffic (ADT) (vehicles per day)	Speed Limit (mph)	Asphalt Width (feet)	Right-of-Way Width (feet)
Local (2 Lanes)	800 – 3,000	25	34	46
Urban Collector (2-3 Lanes)	3,000 – 15,000	25 – 35	34 – 50	46 – 62
Minor Arterial * (3 – 5 Lanes)	15,000 – 35,000	30 – 40	50 – 72	76 – 132
Principal Arterial (7 Lanes)	35,000 – 55,000	40 – 55	84 – 104	88 – 164

* 5 Lanes Crossing I-15




Jerry C. Washburn, Mayor

ATTEST:


Donna R. Weaver, City Recorder

COUNCIL MEMBERS VOTING "AYE"

Margaret Black
Les Campbell
Dean Dickerson
Karen McCandless
Mark Seastrand
Shiree Thurston
Jerry C. Washburn

COUNCIL MEMBERS VOTING "NAY"

Attachment B

From: Paul R. Goodrich
To: Connie A. Douglas
Date: 7/10/2008 2:55 PM
Subject: Fwd: 1200 West Access

>>> Paul R. Goodrich 03/19/2008 12:03 PM >>>
Merrell,

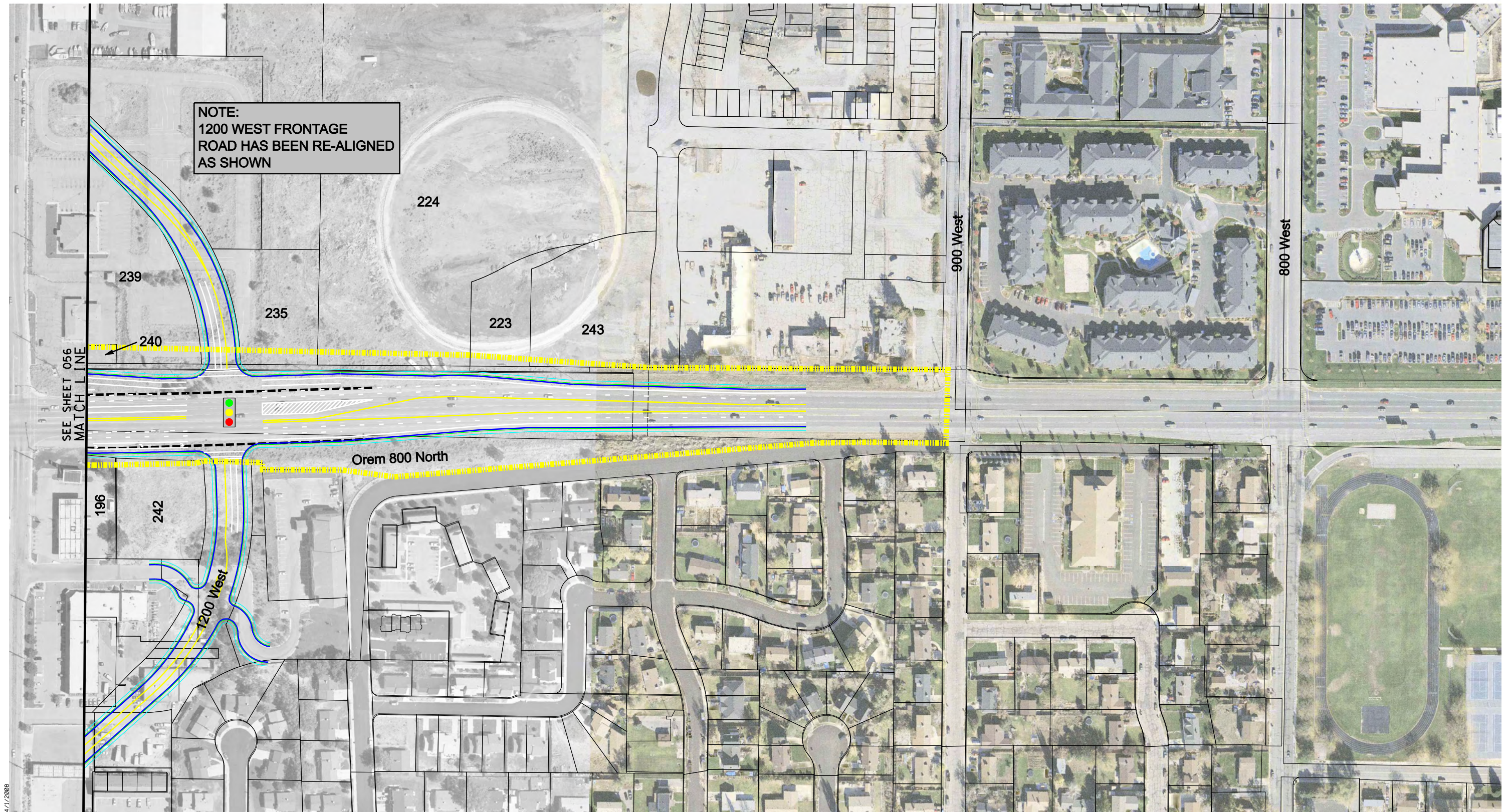
Ed and I both believe that the neighborhood streets (40 South and 85 South) need to be connected to 1200 West and 1000 West for the following reasons:

1. The streets currently have connections to Center Street on both ends (currently at 1160 West and 1000 West).
2. Our subdivision ordinance indicates that dead-end / no-outlet type roads should not be longer than 650 feet (to comply with the International Fire Code). If 85 South and 40 South only connect to 1000 West the length to the end of the no-outlet road would be well over 1000 feet.
3. The road grade connecting the streets to 1000 West is very steep and would be difficult to maneuver in snow and ice conditions.

We would like to explore a possible connection of 40 South and 85 South to 1200 West on the property you label as #80, because we don't want an off-set intersection condition on 1200 West and the access should be as far away from the intersection as possible.

Also, we would like to explore options of how to connect access to the office buildings on Center Street to 1200 West. They currently have access to Center Street at 1160 West (the street where UDOT proposes to re-align 1200 West). They should continue to have access to Center Street from this area; however, we would like to explore ways to not have their access too close to Center Street on 1200 West. Also, we would like to explore ways of connecting the vacant property north of Center Street to 1200 West. This property is shown as Commercial on our General Plan, and the raised median and widening proposed on Center Street may severely restrict it's use without reasonable access.

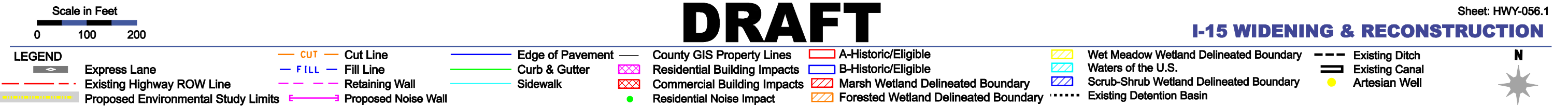
Paul R. Goodrich, P.E.
Transportation Engineer
City of Orem
56 North State Street
Orem Utah, 84057
(801) 229-7320

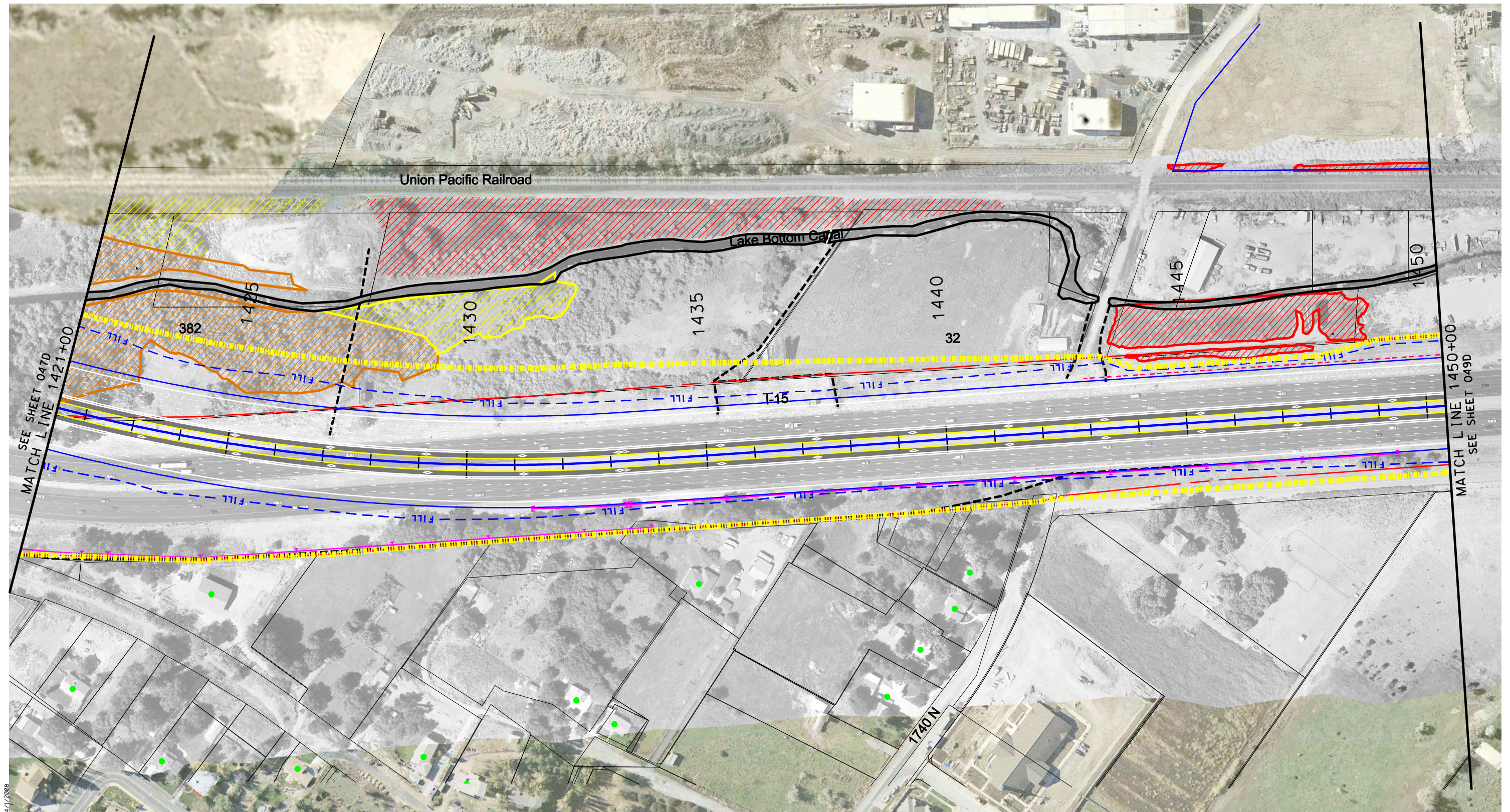


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Sheet: HWY-056.1





4/1/2008

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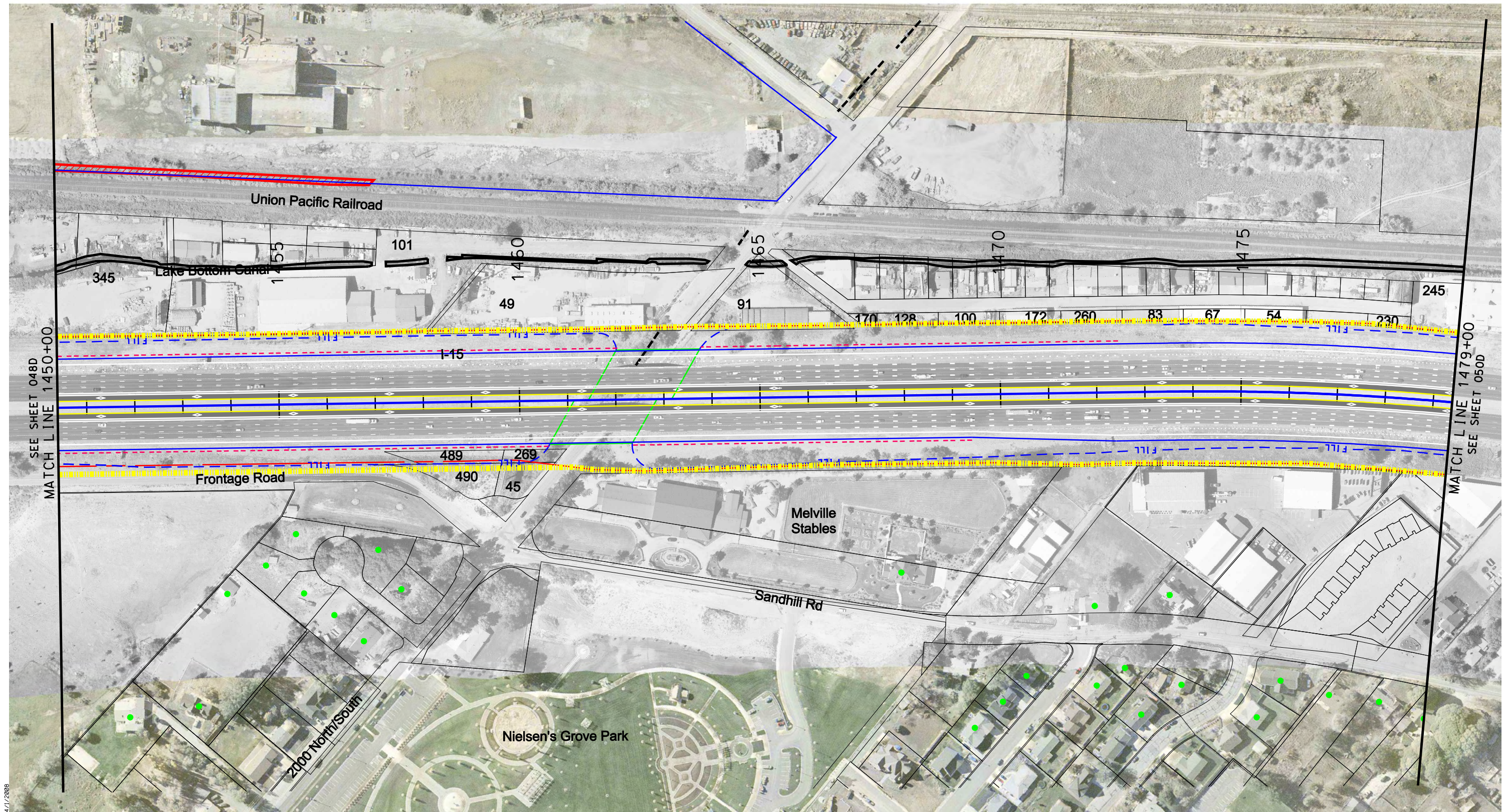
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Sheet: HWY-048D

I-15 WIDENING & RECONSTRUCTION

LEGEND									
	Express Lane		Cut Line		Edge of Pavement		County GIS Property Lines		A-Historic/Eligible
	Existing Highway ROW Line		Fill Line		Curb & Gutter		Residential Building Impacts		B-Historic/Eligible
	Proposed Environmental Study Limits		Retaining Wall		Sidewalk		Commercial Building Impacts		Marsh Wetland Delineated Boundary
			Proposed Noise Wall				Residential Noise Impact		Forested Wetland Delineated Boundary
									Wet Meadow Wetland Delineated Boundary
									Waters of the U.S.
									Scrub-Shrub Wetland Delineated Boundary
									Existing Ditch
									Existing Canal
									Artesian Well
									Existing Detention Basin





4/1/2008

DRAFT

Sheet: HWY-049D

I-15 WIDENING & RECONSTRUCTION

Scale in Feet
0 100 200

LEGEND

- Express Lane
- Existing Highway ROW Line
- Proposed Environmental Study Limits
- CUT Cut Line
- FILL Fill Line
- Retaining Wall
- Proposed Noise Wall

- Edge of Pavement
- Curb & Gutter
- Sidewalk

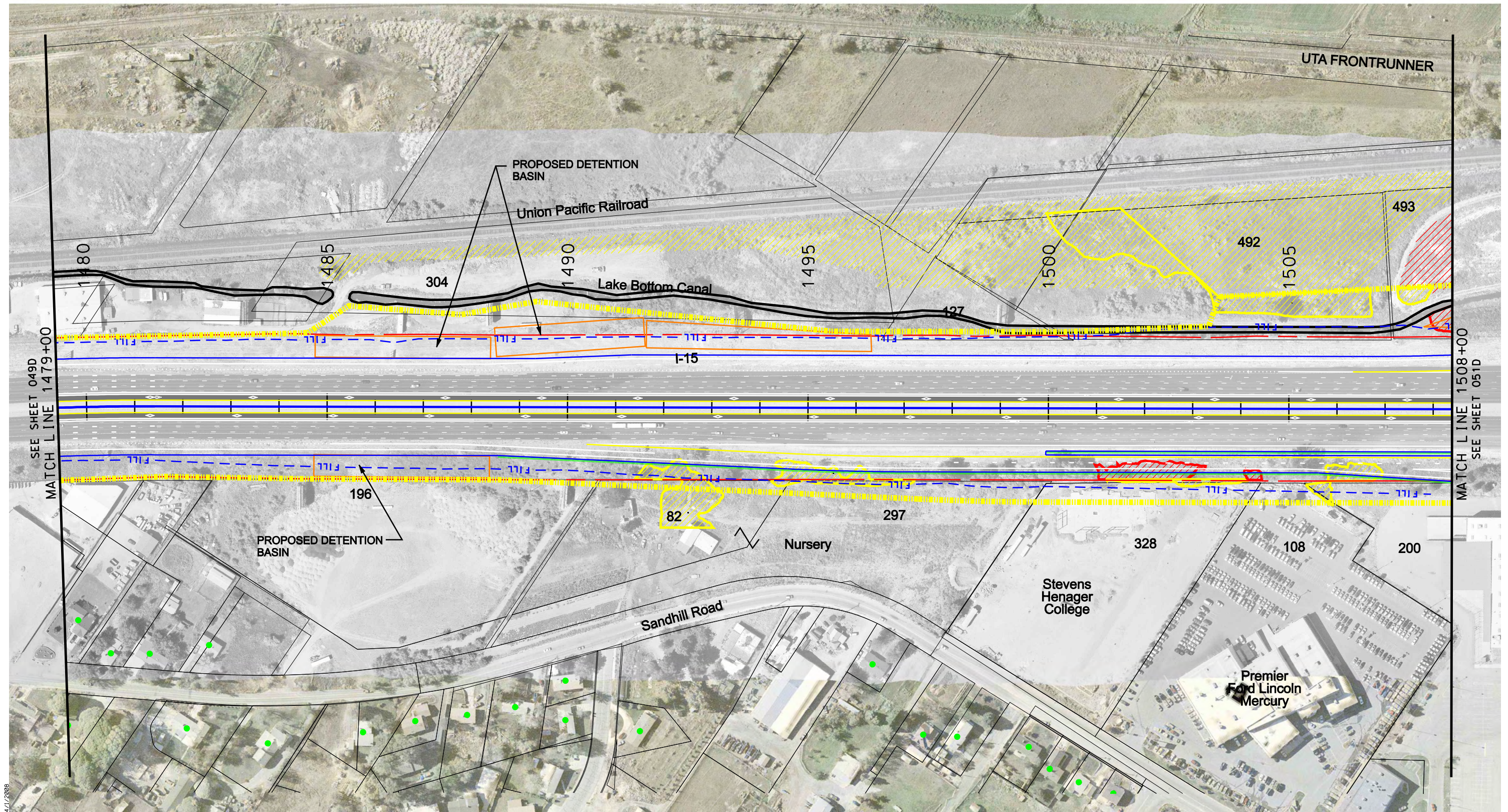
- County GIS Property Lines
- Residential Building Impacts
- Commercial Building Impacts
- Residential Noise Impact

- A-Historic/Eligible
- B-Historic/Eligible
- Marsh Wetland Delineated Boundary
- Forested Wetland Delineated Boundary

- Wet Meadow Wetland Delineated Boundary
- Waters of the U.S.
- Scrub-Shrub Wetland Delineated Boundary
- Existing Detention Basin

- Existing Ditch
- Existing Canal
- Artesian Well





4/1/2008

Scale in Feet
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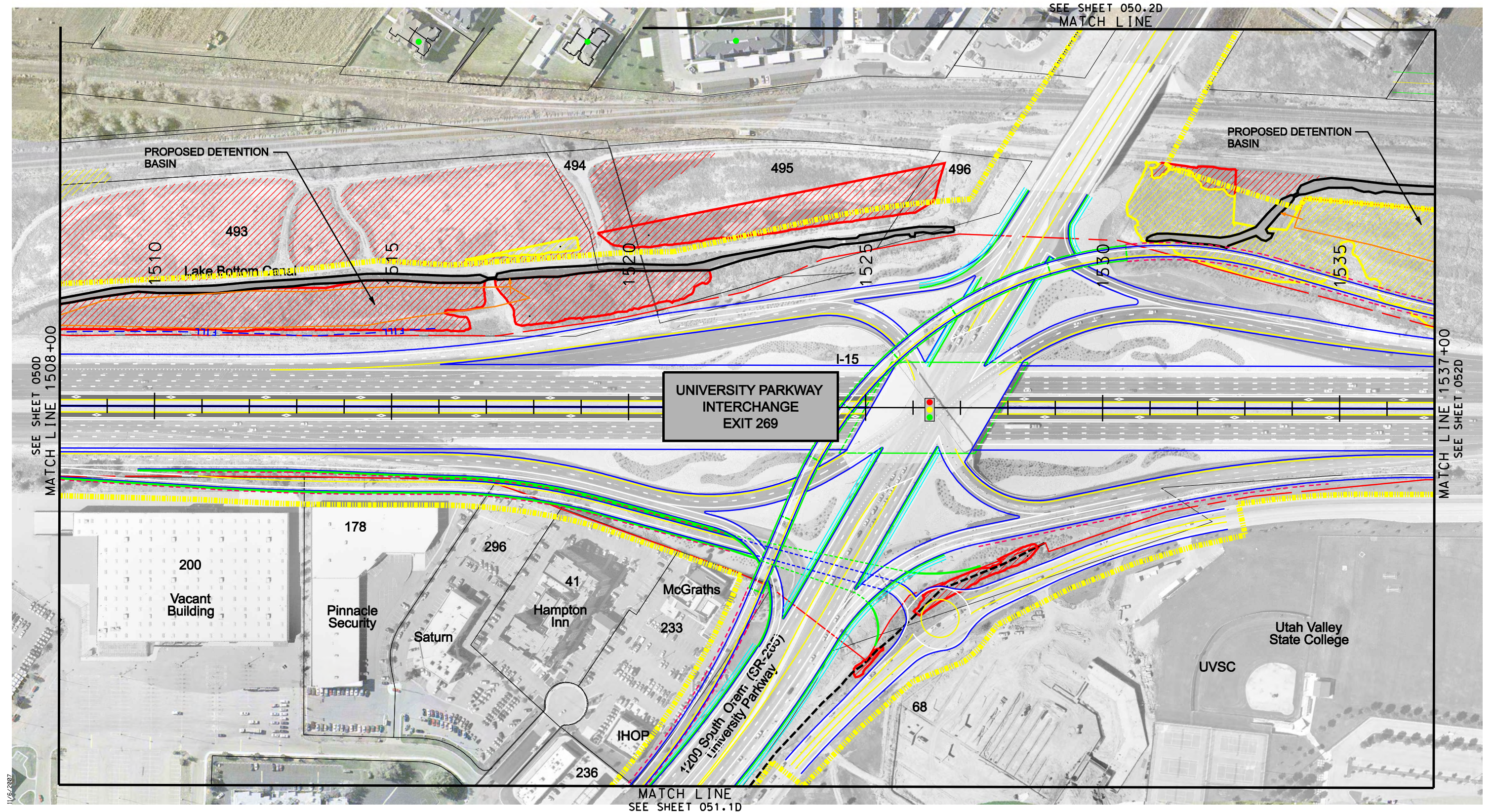
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Sheet: HWY-050D

I-15 WIDENING & RECONSTRUCTION

LEGEND									
	Express Lane		Cut Line		Edge of Pavement		County GIS Property Lines		A-Historic/Eligible
	Existing Highway ROW Line		Fill Line		Curb & Gutter		Residential Building Impacts		B-Historic/Eligible
	Proposed Environmental Study Limits		Retaining Wall		Sidewalk		Commercial Building Impacts		Marsh Wetland Delineated Boundary
			Proposed Noise Wall				Residential Noise Impact		Forested Wetland Delineated Boundary
									Wet Meadow Wetland Delineated Boundary
									Waters of the U.S.
									Scrub-Shrub Wetland Delineated Boundary
									Existing Ditch
									Existing Canal
									Artesian Well
									Existing Detention Basin

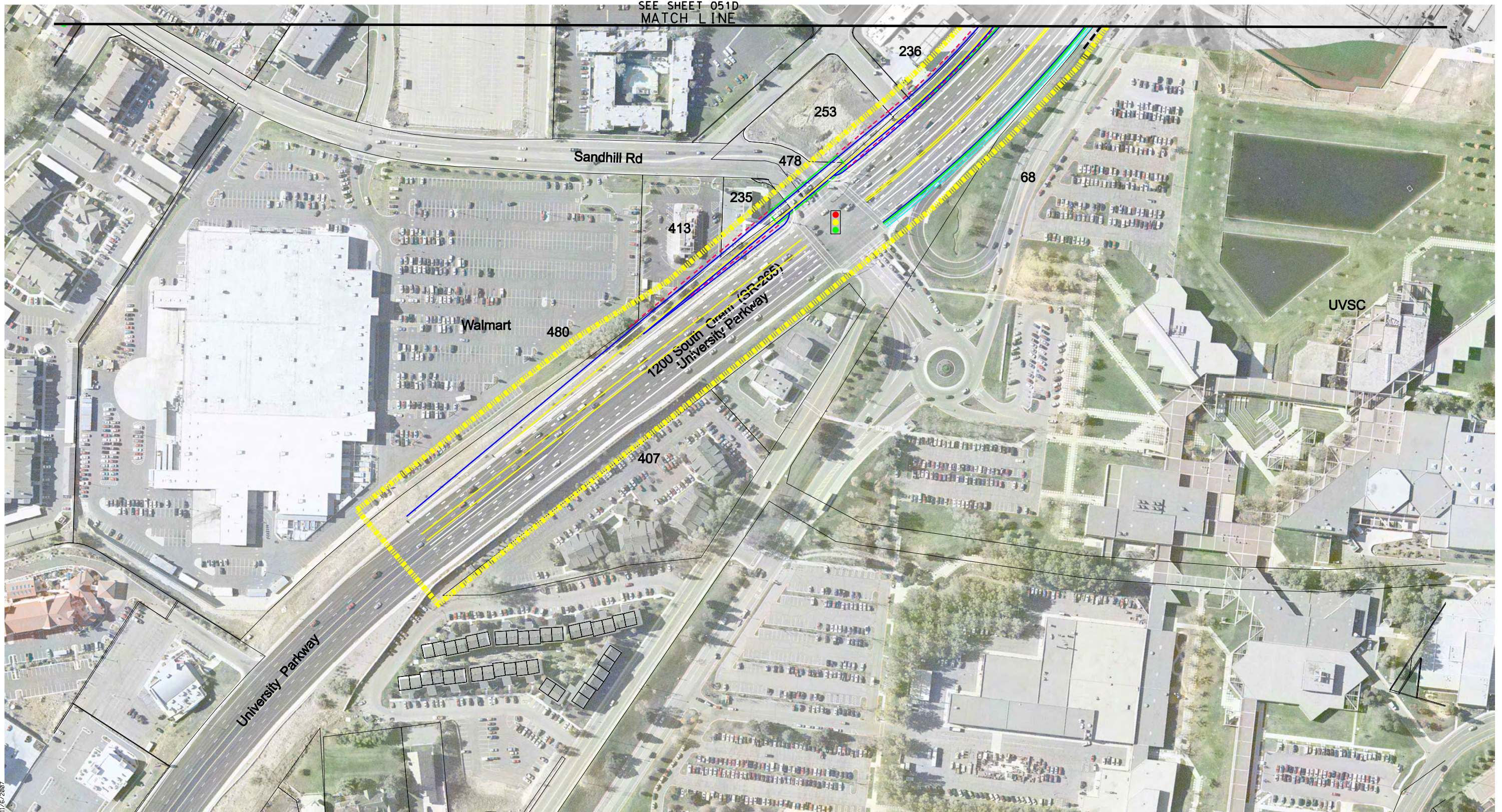




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Sheet: HWY-051D
I-15 WIDENING & RECONSTRUCTION

LEGEND			
	Express Lane		Cut Line
	Existing Highway ROW Line		Fill Line
	Proposed Environmental Study Limits		Retaining Wall
			Proposed Noise Wall
	County GIS Property Lines		Residential Building Impacts
	Commercial Building Impacts		Marsh Wetland Delineated Boundary
	Residential Noise Impact		Forested Wetland Delineated Boundary
	A-Historic/Eligible		Wet Meadow Wetland Delineated Boundary
	B-Historic/Eligible		Waters of the U.S.
	Ditch		Scrub-Shrub Wetland Delineated Boundary
	Canal		Existing Detention Basin
	Artesian Well		



11/6/2007

SEE SHEET 051D
MATCH LINE

DRAFT

Sheet: HWY-051.1D

I-15 WIDENING & RECONSTRUCTION

Scale in Feet
0 100 200

LEGEND

Express Lane

Existing Highway ROW Line

Proposed Environmental Study Limits

CUT Cut Line

FILL Fill Line

Retaining Wall

Proposed Noise Wall

County GIS Property Lines

Residential Building Impacts

Commercial Building Impacts

Residential Noise Impact

A-Historic/Eligible

B-Historic/Eligible

Marsh Wetland Delineated Boundary

Forested Wetland Delineated Boundary

Wet Meadow Wetland Delineated Boundary

Waters of the U.S.

Scrub-Shrub Wetland Delineated Boundary

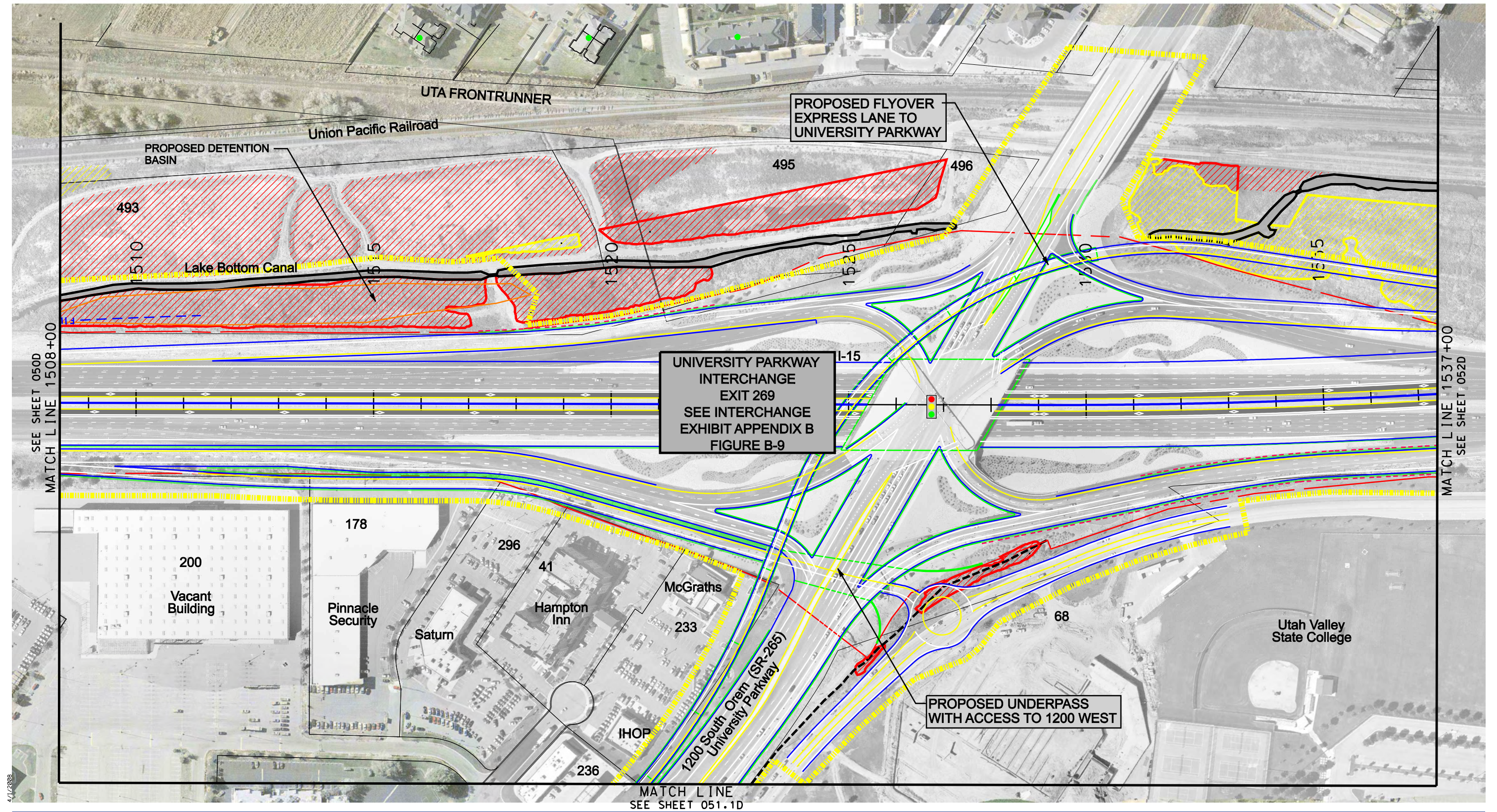
Existing Detention Basin

Ditch

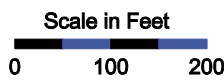
Canal

Artesian Well





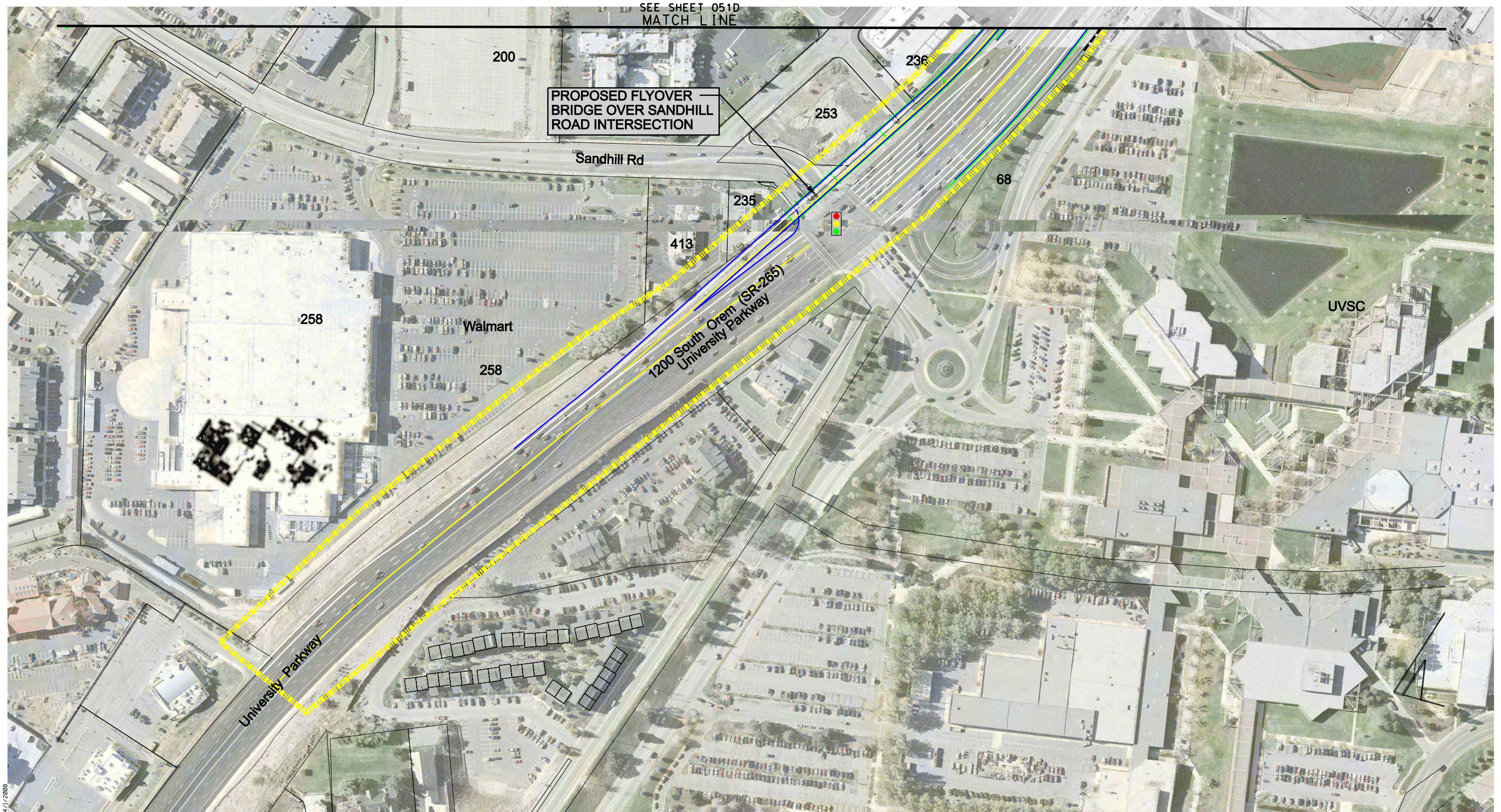
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LEGEND		Express Lane	CUT Cut Line	Edge of Pavement	County GIS Property Lines	A-Historic/Eligible	Wet Meadow Wetland Delineated Boundary	Existing Ditch
Existing Highway ROW Line	FILL Fill Line	Retaining Wall	Curb & Gutter	Residential Building Impacts	B-Historic/Eligible	Marsh Wetland Delineated Boundary	Waters of the U.S.	Existing Canal
Proposed Environmental Study Limits	Proposed Noise Wall	Sidewalk	Commercial Building Impacts	Residential Noise Impact	Forested Wetland Delineated Boundary	Scrub-Shrub Wetland Delineated Boundary	Existing Detention Basin	Artesian Well



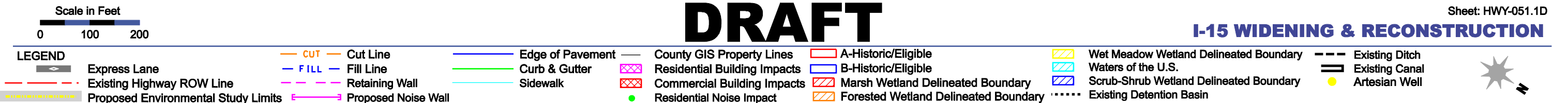


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Sheet: HWY-051.1D

I-15 WIDENING & RECONSTRUCTION



Attachment G

2.4.5 Summary Comparison of Alternatives and Options

Table 2-5 presents a summary of the traffic analysis and comparison described above.

Table 2-5: LOS Summary Comparison

Section		Mainline Sections		Intersection Components	
		Total	LOS E or F	Total	LOS E or F
South Utah County					
	Alternative 1	7	5	14	12
	Alternative 4	7	0	14	0
Central Utah County					
Common Area	Alternative 1	4	4	9	6
	Alternative 4	4	1	9	1
Option Area	Alternative 1	2	2	9	6
	Alt 4 Option A	2	0	9	0
	Alt 4 Option B	2	0	9	2
	Alt 4 Option C	2	0	9	2
	Alt 4 Option D	2	0	9	2
North Utah County					
Common Area	Alternative 1	5	5	13	11
	Alternative 4	5	3	13	1
American Fork Interchange	Alternative 1	N/A	N/A	4	3
	Alt 4 Option A	N/A	N/A	4	1
	Alt 4 Option B	N/A	N/A	3	1
	Alt 4 Option C	N/A	N/A	3	1
North Lehi	Alternative 1	2	2	8	6
	Alt 4 w/o Interchange	2	1	8	3
	Alt 4 w/ Interchange	2	1	9	0
South Salt Lake County					
	Alternative 1	2	2	4	1
	Alternative 4	2	2	4	1

2.5 Impacts on the Transportation System

The improvements to the I-15 corridor under Alternative 4 would impact the roadway system in Utah and Salt Lake counties. To assess these impacts, traffic volumes and level of service were analyzed for select north-south and east-west roadways. The volumes were calculated by applying the daily volume changes forecasted by the WFRC/MAG travel model to existing roadway volumes. The HCM Arterial Planning methodology was used to develop a lookup table of daily volumes to approximate roadway level-of-service.

In the Central Utah County section, which includes the frontage road options, the north-south roadways are Geneva Road, Orem 1200 West, Orem 400 West, Orem Main Street, State Street and University Avenue. The east-west roadways are Orem Center Street, Orem 200 South, Orem 400 South, Orem 800 South, University Parkway, Provo 1740 North, Provo 820 North and Provo Center. The results of this analysis are summarized in Tables 2-6 and 2-7.

For the other three sections, the north-south-roadways are State Street, Geneva Road, Alpine Highway (SR-74), Redwood Road, and the proposed Mountain View Corridor. No east-west roadways are included in the analysis for this section of the corridor. The results of this analysis are summarized in Table 2-8.

1
Table 2-6: Volume and LOS on North/South Roadways - Central Utah County

Location	Alternative 1 (No-Build)		Alternative 4 Option A		Alternative 4 Option B		Alternative 4 Option C		Alternative 4 Option D		
	vehicles/day	LOS	vehicles/day	LOS	vehicles/day	LOS	vehicles/day	LOS	vehicles/day	LOS	
Geneva Road											
	Orem 1600 N to Orem Center Street	41,000	F	32,000	C	35,000	C	34,000	C	36,000	C
	Orem Center St to University Pkwy	33,000	C	21,000	C	29,000	C	23,000	C	30,000	C
University Pkwy to Provo Center St	19,000	C	14,000	C	14,000	C	18,000	C	18,000	C	
Orem 1200 West											
	Orem 1600 N to Orem Center St	11,000	D	9,100	D	9,500	D	9,100	D	9,400	D
	Orem Center St to Orem 800 S	16,000	F	8,000	D	13,000	D	8,500	D	14,000	E
Orem 400 West											
	Orem 800 N to Orem Center St	9,500	D	8,600	D	8,800	D	8,700	D	8,900	D
	Orem Center St to Orem 800 S	11,000	D	9,500	D	9,900	D	9,700	D	10,000	D
Orem 800 S to University Parkway	14,000	E	12,000	D	12,000	D	12,000	D	13,000	D	
Orem Main Street											
	Orem 800 S to University Parkway	5,800	C	5,400	C	5,700	C	5,600	C	5,900	C
	University Pkwy to Orem 2000 S	10,000	D	13,000	D	14,000	E	10,000	D	10,000	D
Orem 2000 S to Provo 1730 N	6,800	C	14,000	E	14,000	E	6,400	C	6,500	C	
State Street											
	Orem 1600 N to Orem Center St	75,000	F	69,000	F	68,000	F	70,000	F	70,000	F
	Orem Center St to Provo Center St	77,000	F	73,000	F	72,000	F	75,000	F	74,000	F
University Avenue											
	University Pkwy to Provo Center St	62,000	F	59,000	E	59,000	E	60,000	E	61,000	E
	Provo Center St to I-15	53,000	C	51,000	C	51,000	C	53,000	C	53,000	C

Table 2-7: Volume and LOS on East/West Roadways - Central Utah County

Location	Alternative 1 (No-Build)		Alternative 4 Option A (with frontage roads)		Alternative 4 Option B (with frontage roads)		Alternative 4 Option C		Alternative 4 Option D	
	vehicles/day	LOS	vehicles/day	LOS	vehicles/day	LOS	vehicles/day	LOS	vehicles/day	LOS
Orem Center Street										
Geneva Rd to 1200 West	25,000	C	14,000	C	22,000	C	14,000	C	21,000	C
1200 West to 400 West	43,000	F	42,000	F	41,000	F	43,000	F	41,000	F
400 West to State Street	39,000	E	39,000	E	38,000	D	40,000	E	38,000	D
Orem 400 South										
Geneva Rd to 800 West	8,600	D	6,600	C	8,600	D	7,100	C	9,300	D
800 West to State Street	10,000	D	8,800	D	9,100	D	9,000	D	9,400	D
Orem 800 South										
800 West to 400 West	6,000	C	10,000	D	5,600	C	11,000	D	5,700	C
400 West to Main Street	10,000	D	12,000	D	9,900	D	13,000	D	10,000	D
Main Street to State Street	15,000	F	16,000	F	15,000	F	16,000	F	15,000	F
University Parkway										
Geneva Rd to I-15	29,000	C	21,000	C	26,000	C	22,000	C	29,000	C
I-15 to 400 West	48,000	C	42,000	C	39,000	C	51,000	C	46,000	C
400 West to State St	57,000	D	55,000	C	59,000	E	60,000	E	64,000	F

1

Table 2-7: Volume and LOS on East/West Roadways - Central Utah County - continued

Location	Alternative 1 (No-Build)		Alternative 4 Option A (with frontage roads)		Alternative 4 Option B (with frontage roads)		Alternative 4 Option C		Alternative 4 Option D	
	vehicles/day	LOS	vehicles/day	LOS	vehicles/day	LOS	vehicles/day	LOS	vehicles/day	LOS
Orem 2000 South										
	5,000	C	4,700	C	4,300	C	5,500	C	5,500	C
	2,900	C	5,500	C	4,600	C	3,300	C	3,400	C
Main St to Columbia Lane	3,900	C	6,900	C	6,200	C	4,200	C	4,200	C
Provo 1740 North / Grandview Lane										
	6,400	C	9,600	D	9,300	D	5,600	C	5,600	C
Sandhill Rd to Columbia Lane	5,300	C	5,300	C	5,300	C	5,500	C	5,600	C
Provo 820 North										
	14,000	C	17,000	C	17,000	C	13,000	C	13,000	C
	14,000	C	19,000	C	19,000	C	14,000	C	14,000	C
Independence to 500 W	26,000	C	28,000	C	28,000	C	26,000	C	26,000	C
500 W to University Ave										
Provo Center Street										
	34,000	C	33,000	C	33,000	C	37,000	C	37,000	C
	43,000	C	41,000	C	41,000	C	42,000	C	42,000	C
900 West to 500 West	18,000	C	19,000	C	18,000	C	18,000	C	18,000	C
500 W to University Ave										

Table 2-8: Volume and LOS – South Utah, North Utah and South Salt Lake County Sections

Roadway Segment	Alternative 1 (No Build)		Alternative 4	
	Daily Volumes (vehicles per day)	LOS	Daily Volumes (vehicles per day) (change relative to Alternative 1)	LOS
State Street SR 77 to Provo 1860 South US 6 to SR 77	33,000 16,000	C B	30,000 (-9%) 15,000 (-6%)	C B
State Street Orem 1600 North to SR 74	62,000	F	50,000 (-19%)	C
Geneva Road Orem 1600 North to State Street	36,000	C	31,000 (-14%)	C
SR 74 State Street to SR 92	26,000	C	28,000 (8%)	C
Redwood Road SR 73 to County Line	29,000	C	26,000 (-10%)	C
Proposed Mountain View Corridor SR 73 to County Line	94,000	D	92,000 (-2%)	D
Redwood Road County Line to Bangerter Highway	23,000	C	19,000 (-17%)	C
Proposed Mountain View Corridor County Line to 13400 South	125,000	E	121,000 (-3%)	E

2.5.1 Summary of Transportation System Impacts

Several of the north/south roads would have substantial changes in traffic volumes and level-of-service from the Alternative 4 improvements. These are Geneva Road, Orem Main Street, Orem 1200 West, and Orem 400 West.

Geneva Road: Between Orem Center Street and Orem 1600 North, Geneva Road would see a 12% to 22% decrease in traffic volumes, which would improve the LOS in all options from F to C. Under Options A and C, volumes between University Parkway and Orem Center Street would decrease by 30% to 36%. Under Options B and D, volumes would decrease by only 9% to 12%. In all cases, the LOS would be C. Between Provo Center Street and University Parkway, volumes under Options A and B would be 14,000 vehicles per day, suggesting that a contemplated expansion of the roadway to four travel lanes may not be required. Under Options C and D, the volume would be 18,000 vehicles per day – generally more than two travel lanes could effectively handle.

Orem 1200 West: Between Orem Center Street and Orem 800 South, 1200 West would see a 50% decrease in traffic volume under Options A and C (with the Orem 800 South Interchange) and an improved LOS from F to D. Option B would reduce traffic volume by 19%, which would also improve the LOS from F to D. Option D would reduce traffic volume by 13%, which would improve the LOS from F to E.

Attachment H

I-15 Corridor Utah County to Salt Lake County
Final Environmental Impact Statement and Section 4(f) Evaluation

Table 2-6: Volume and LOS on North/South Roadways - Central Utah County Section

Location	Alternative 1 (No-Build)		Alternative 4 Option A		Alternative 4 Option B		Alternative 4 Option C		Alternative 4 Option D (Preferred)	
	vehicles/ day	LOS	vehicles/ day	LOS	vehicles/ day	LOS	vehicles/ day	LOS	vehicles/ day	LOS
Geneva Road										
Orem 1600 N to Orem Center St	27,000	C	20,000	C	21,000	C	21,000	C	22,000	C
Orem Center St to University Pkwy	46,000	C	34,000	C	40,000	C	35,000	C	42,000	C
University Pkwy to Provo Center St	17,000	D	15,000	C	15,000	C	18,000	E	18,000	E
Orem 1200 West										
Orem 1600 N to Orem Center St	14,000	E	12,000	D	13,000	D	12,000	D	13,000	D
Orem Center St to Orem 800 S	17,000	F	6,300	C	15,000	F	6,600	C	15,000	F
Orem 400 West										
Orem 800 N to Orem Center St	9,700	D	9,100	D	9,200	D	9,100	D	9,300	D
Orem Center St to Orem 800 S	8,900	D	7,500	C	8,300	D	7,600	C	8,400	D
Orem 800 S to University Parkway	11,000	D	10,000	D	11,000	D	9,900	D	11,000	D
Orem Main Street										
Orem 800 S to University Parkway	5,300	C	5,200	C	5,400	C	5,000	C	5,200	C
University Pkwy to Orem 2000 S	8,100	D	11,000	D	11,000	D	7,900	C	8,100	D
Orem 2000 S to Provo 1730 N	7,400	C	15,000	F	15,000	F	7,000	C	7,300	C
State Street										
Orem 1600 N to Orem Center St	66,000	F	60,000	E	61,000	E	61,000	E	62,000	F
Orem Center St to University Pkwy	69,000	F	65,000	F	65,000	F	66,000	F	66,000	F
University Pkwy to Provo Center St	59,000	E	56,000	D	56,000	D	59,000	E	59,000	E
University Avenue										
University Pkwy to Provo Center St	60,000	E	59,000	E	59,000	E	59,000	E	60,000	E
Provo Center St to I-15	46,000	C	48,000	C	47,000	C	48,000	C	49,000	C

Table 2-7: Volume and LOS on East/West Roadways - Central Utah County Section

Location	Alternative 1 (No-Build)		Alternative 4 Option A		Alternative 4 Option B		Alternative 4 Option C		Alternative 4 Option D (Preferred)	
	vehicles/ day	LOS	vehicles/ day	LOS	vehicles/ day	LOS	vehicles/ day	LOS	vehicles/ day	LOS
Orem Center Street										
Geneva Rd to 1200 West	31,000	C	24,000	C	28,000	C	22,000	C	27,000	C
1200 West to 400 West	39,000	E	42,000	F	39,000	E	42,000	F	39,000	E
400 West to State Street	32,000	C	37,000	D	34,000	C	38,000	D	34,000	C
Orem 400 South										
Geneva Rd to 800 West	13,000	D	5,800	C	13,000	D	6,000	C	13,000	D
800 West to State Street	9,700	D	7,600	C	8,700	D	7,700	C	8,900	D
Orem 800 South										
800 West to 400 West	9,700	B	20,000	C	9,300	B	21,000	C	9,700	B
400 West to Main Street	15,000	C	19,000	C	15,000	C	19,000	C	16,000	C
Main Street to State Street	21,000	C	23,000	C	21,000	C	24,000	C	21,000	C
University Parkway										
Geneva Rd to I-15	37,000	C	24,000	C	33,000	C	26,000	C	37,000	C
I-15 to 400 West	51,000	C	52,000	C	47,000	C	59,000	E	55,000	C
400 West to State St	50,000	C	54,000	C	56,000	D	57,000	D	59,000	E

Table 2-7: Volume and LOS on EastWest Roadways - Central Utah County Section - continued

Location	Alternative 1 (No-Build)		Alternative 4 Option A		Alternative 4 Option B		Alternative 4 Option C		Alternative 4 Option D (Preferred)	
	vehicles/ day	LOS	vehicles/ day	LOS	vehicles/ day	LOS	vehicles/ day	LOS	vehicles/ day	LOS
Orem 2000 South										
	5,700	C	6,900	C	6,800	C	5,800	C	5,900	C
	4,100	C	5,800	C	5,100	C	4,200	C	4,200	C
Geneva Rd to Sandhill Rd Sandhill Rd to Main St Main St to Columbia Lane	5,800	C	8,800	D	9,000	D	5,800	C	5,900	C
Provo 1740 North / Grandview Lane Sandhill Rd to Columbia Lane Columbia Lane to State Street	4,600	C	7,500	C	7,900	C	4,600	C	4,600	C
	8,200	D	7,600	C	7,700	C	8,300	D	8,500	D
Provo 820 North Geneva Rd to Independence Independence to 500 W 500 W to University Ave	17,000	C	23,000	C	22,000	C	17,000	C	17,000	C
	14,000	C	17,000	C	17,000	C	14,000	C	14,000	C
	27,000	C	25,000	C	25,000	C	24,000	C	24,000	C
Provo Center Street Geneva Rd to 900 West 900 West to 500 West 500 W to University Ave	21,000	C	27,000	C	27,000	C	31,000	C	31,000	C
	47,000	C	36,000	C	36,000	C	36,000	C	36,000	C
	20,000	C	21,000	C	21,000	C	19,000	C	20,000	C

Table 2-8: Volume and LOS – South Utah, North Utah and South Salt Lake County Sections

Roadway Segment	Alternative 1 (No Build)		Alternative 4 (Preferred)	
	Daily Volumes (vehicles per day)	LOS	Daily Volumes (vehicles per day) (change relative to Alternative 1)	LOS
State Street SR 77 to Provo 1860 South US 6 to SR 77	23,000 19,000	C E	22,000 (-4%) 18,000 (-6%)	C E
State Street Orem 1600 North to SR 74	48,000	C	42,000 (-13%)	C
Geneva Road Orem 1600 North to State Street	23,000	C	20,000 (-13%)	C
SR 74 State Street to SR 92	26,000	C	26,000 (0%)	C
Redwood Road SR 73 to County Line	10,000	B	8,000 (-21%)	B
Proposed Mountain View Corridor SR 73 to County Line	78,000	C	75,000 (-4%)	C
Redwood Road County Line to Bangerter Highway	20,000	C	15,000 (-25%)	C
Proposed Mountain View Corridor County Line to 13400 South	78,000	C	68,000 (-13%)	C

2.5.1 Summary of Transportation System Impacts

Several of the north/south roads would have substantial changes in traffic volumes and level-of-service between Alternative 1 and Alternative 4. These are Geneva Road, Orem 1200 West, Orem Main Street and State Street. For each road, traffic volumes are generated from the most recent MAG model (6.0). However, individual studies of particular corridors may need to modify the model to better suit local conditions. For that reason, volumes may differ between studies of differing scales. Those studies should be consulted for their own traffic volumes.

Geneva Road: Between Provo Center Street and University Parkway, volumes under Options A and B would be 15,000 vehicles per day. Under Options C and D (Preferred), the volume would be 18,000 vehicles per day and Geneva Road would operate at LOS E.

Orem 1200 West: Between Orem 800 South and Orem Center Street, 1200 West would see about a 60% decrease in traffic volume under Options A and C (with the Orem 800 South Interchange) and an improved LOS from F to C. Options B and D (Preferred) would reduce traffic volume by 12%; however, the LOS would remain at F.



153 North 100 East • P.O. Box 255 • Lehi, Utah 84043 - 1895
768-7100 • Fax: 768-7101

July 22, 2008

Carlos Machado, MBA
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, Utah 84118

Dear Mr. Machado:

Upon review of the I-15 Final Environmental Impact Statement ("FEIS"), the Mayor and Council of Lehi City would like to submit the following comments. Many of our comments are a reiteration of, or similar to, the comments we submitted on the Draft Environmental Impact Statement ("DEIS") last January.

We recognize that with the reconstruction of I-15 there is an opportunity to improve access and mobility across the freeway at various locations in our community. While we are supportive of Alternative 4 of the FEIS (I-15 Widening and Reconstruction, plus CRT), the following items and changes to the I-15 FEIS document are critical to our community as they relate to future reconstruction and improvements of I-15:

1. A new I-15 crossing (over or under) needs to be constructed at 2300 West. This will allow 2300 West to continue north of I-15 and connect to 3200 North and eventually SR-92 and will facilitate north south movement in the area without channeling traffic through the SR-92 or 1200 West freeway interchanges. This I-15 crossing is shown on the current Lehi City Master Transportation Plan. The 2300 West crossing originated from the January 2007 Transportation Summit that was held at MAG. MAG also shows this 2300 West crossing on their current Regional Transportation Plan.
2. Both the Utah County trail master plan and Lehi City's trail plan indicate a trail crossing of I-15 to connect the Murdock Canal Trail to the Jordan River Parkway somewhere near the SR-92 interchange (final location has not been determined). The 2300 West crossing discussed in the comment above needs to be designed such that it accommodates this trail connection in addition to the road ROW.
3. The DEIS shows the construction of a new interchange in north Lehi, north of the existing SR-92 interchange. We support an interchange in this vicinity, but believe this new interchange will

function best at 4800 North, with an additional separate underpass at the Frank Ghery project site. This will allow better spacing between the existing SR-92 interchange and the new interchange. This new underpass will be needed to support local traffic between the Traverse Mountain & Frank Ghery projects and the west side of the freeway and also to provide for a trail connection from the Murdock Canal Trail and Historic Southern Rail Trail to the Jordan River Parkway. It is crucial therefore, that the new interchange be shown at the 4800 North location, and that a new underpass be added at the Frank Ghery project site.

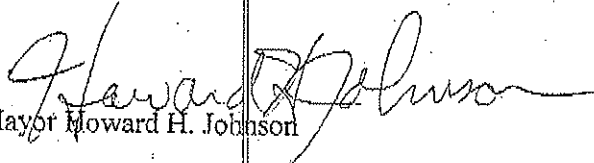
4. The following existing I-15 crossings need to be widened/expanded as follows as per the current adopted Lehi City Master Transportation Plan:
 - a. 600 East overpass needs to be widened to accommodate our master planned road size for 600 East of 44 feet of asphalt with 6 foot sidewalks.
 - b. 100 East underpass needs to be widened to accommodate our master planned road size for 100 East of 38 feet of asphalt and 62 foot overall ROW width.
 - c. 300 West underpass needs to be widened to accommodate our master planned road size for 300 West of 48 feet of asphalt and 70 foot overall ROW width.
5. Lehi City and MAG are planning for a regional trail (Historic Southern Rail Trail) along the rail corridor owned by UTA. This 10 foot wide asphalt trail is currently being planned from the Lehi/American Fork boundary to the point of the mountain where it will continue north into Salt Lake County. A study is currently under way for the environmental and preliminary design of this trail. In order to accommodate this 10 foot wide trail, the existing I-15 underpass at US-89 needs to be widened. This trail also needs to be considered with the widening of I-15 and reconstruction of the east frontage road at the point of the mountain to allow a safe trail corridor.
6. The EIS shows three alternatives (A, B, and C) for the American Fork Main Street interchange and the associated East West Connector (Pioneer Crossing Boulevard). Lehi City has recently held discussions with the East West Connector team about a new non-at grade crossing design for 850 East, where the East West Connector and 850 East intersect at the railroad tracks. We are highly supportive of this new non-at grade crossing design of 850 East. If this new design is incorporated into the EW Connector project, we support either option A or C in the I-15 FEIS. Without the non-at grade crossing, it remains our opinion that option B is the best option (this option shows the East-West Connector Road extending straight east into American Fork on 200 South and connecting into a SPUI with the combined railroad overpass structure adjacent to the SPUI).
7. The following items need to be addressed with regard to the proposed 2100 North interchange improvements:
 - a. There needs to be a direct connection from south bound I-15 to US-89 (State Street) to alleviate traffic congestion and back-up onto the freeway. Currently at this interchange, the major traffic demand is from southbound I-15 traffic as it exits on the 2100 North

interchange and continues south into Lehi on US-89. The current design in the FEIS would require a right hand turn, weaving across 2100 North, and then a left hand turn to get to US-89, which is not acceptable.

- b. We have several concerns with the proposed realigned frontage road on the north east side of the interchange. The proposed FEIS design shows the realigned frontage road with offset intersections at both 2100 North, which is a collector class road and 1200 West, which is an arterial class road. These offset alignments do not meet City standards.
- c. By realigning the frontage road, all of the properties along 2100 North that are west of 900 West will end up on an extremely long dead end road. This resulting dead end or cul-de-sac far exceeds the City's standard for maximum cul-de-sac length of 400 feet. This issue must be resolved so that basic safety and access standards are met. No discussion about this realignment has been held between the City and UDOT. This issue was overlooked by the City in the draft EIS document, but had the City been aware of what was proposed, we would have made comments at an earlier date.

Thank you for allowing us an opportunity to comment on the draft I-15 EIS Study. We recognize the significance and need for the widening and other improvements that are planned for the I-15 corridor, and appreciate the efforts of the I-15 EIS team to move this project forward.

Sincerely,


Mayor Howard H. Johnson

cc: Merrell Jolley - Project Manager
UDOT Region Three Headquarters
658 North 1500 West
Orem, Utah 84057



SCANNED
DM 8/4/08

BLUFFDALE CITY

14175 SOUTH REDWOOD ROAD • BLUFFDALE, UTAH 84065 • (801) 254-2200

Carlos Machado
Federal Highway Administration, Utah Division
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118

Dear Mr. Machado,

Thank you for the opportunity to respond to the Final Environmental Impact Statement (FEIS) for the I-15 project. Bluffdale City appreciates the efforts made to accommodate our comments on the Draft Environmental Impact Statement (DEIS). Our main concern with the DEIS was the lack of a crossing for the county trail system into Draper (Bonneville Shoreline Trail).

We have noted the addition of a trail crossing under I-15. While this change is certainly an improvement over the DEIS, which provided no crossing, the location shown is well south of where we have historically planned for the trail connection. For some time, we have been planning on the trail heading west along 14600 South until it reaches approximately 650 West and then head south through a development that has received plat approval for the first phase containing the trail. As such, in order to facilitate the crossing shown on the FEIS, there will need to be land acquisitions or easements obtained that the City has not been preparing to pursue. Had the trail come along 14600 South to the planned location at 650 West, the Right-of-Way has already been secured. Because of this, Bluffdale City requests that a crossing be maintained on FEIS, but that it occurs closer to 14600 South to utilize the existing trail accommodations.

Again, the City appreciates all efforts made to date on this project and is eager to see the improvements to I-15 and especially the 14600 South exit. To discuss this matter further, please call me at 254-2200.

Sincerely,

Vaughn Pickell, Esq.
Community Development Director

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AUG 01 2008

FHWA Utah Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

JUL 30 2008

Ref: 8EPR-N

Walter C. Waidelich, Division Administrator
Federal Highway Administration
2520 West 4700 South
Suite 9A
Salt Lake City, UT 84118

John Njord, Executive Director
Utah Department of Transportation
4105 South 2700 West
Salt Lake City, UT 84119

Re: Comments on I-15 Corridor Utah County to
Salt Lake County, Final Environmental Impact
Statement (FEIS): CEQ#: 2008024

Dear Messrs: Waidelich and Njord:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C. Section 4231 et. seq., and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the I-15 Corridor Final Environmental Impact Statement (FEIS). The proposed action includes improvements to approximately 43 miles of Interstate 15 in Utah and Salt Lake Counties. The project's southern terminus is the South Payson-I-15 interchange, Exit 248, in the City of Payson; its northern terminus is the 12300 South I-15 interchange, Exit 291, in the City of Draper. The purpose of this project is to address the anticipated north-south mobility needs within the new I-15 corridor through the year 2030. The Preferred Alternative includes the following:

- Reconstruction of I-15, including addition of general-purpose lanes to I-15
- Extension of express lanes to US-6 in Spanish Fork
- Reconstruction of existing interchanges
- Construction of Option C at the American Fork main Street Interchange
- Construction of Option D in the Provo/Orem area
- Construction of a new interchange at North Lehi
- Improvements to bridges that cross the roadway
- Improvements to connecting arterial streets

- Construction of structures to accommodate new undercrossing at Provo 500 West and Orem 1200 North

EPA believes that the Preferred Alternative arguably represents the Least Environmentally Damaging Practicable Alternative (LEDPA), and has the least impacts to wetlands according to acreage and will reduce wetland impacts by 30% over other alternatives. The highest number of acres of wetland impacts within the Provo/Orem segment resulted from the frontage roads which were eliminated in the Preferred Alternative. However, we have concerns that the Preferred Alternative has greater impacts to higher quality wetlands, especially in American Fork, despite having the lowest total acreage of impacts. The American Fork Main Street Interchange area contains proportionally more Category 2 wetlands than the rest of the study area and the preferred American Forks Main Street Option C impacts 0.8 acres more of Category 2 wetlands than Option A, which has similar total acreage impacts.

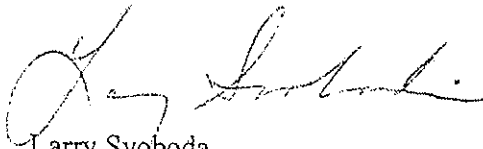
EPA has concerns with the Mobile Air Source Toxic (MSATS) language in the FEIS. EPA and FHWA have been negotiating language on MSATS for some time. We have not yet reached consensus regarding language both agencies agree on for inclusion in EISs. We also note that the draft transportation conformity determination has not been completed for this project. EPA requests a copy of the draft conformity determination prior to issuance of the Record of Decision for our review. Regarding air quality mitigation, we note that the final document lacks specificity regarding construction impacts and mitigation measures. The Best Management Practices (BMPs) for this project should include measures that would reduce particulate emissions from both construction diesels and fugitive dust.

Finally, we commend FHWA and UDOT on disclosure of carbon dioxide emission estimates for the Baseline, No-Build and Preferred Alternative scenarios. The Regional emissions estimates from project-influenced roads indicate a significant increase in carbon dioxide emissions between the Baseline and Preferred Alternative (approximately 478,000 tons per year). Please explain why this increase is not consistent with estimates contained in the *Mountain View Corridor EIS* which indicate that the State's carbon dioxide emissions from highways are estimated to decrease by 6% during the same timeframe.

EPA appreciates the opportunity to review this project. We also acknowledge the complexities in designing a highway such as this one in a manner that meets the purpose and need, considers and mitigates environmental impacts and attempts to meet the needs of the local communities.

If you have any questions or would like to discuss our comments, please contact me at (303) 312-6004 or Robin Coursen of my staff at (303)312-6695.

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Cc: Greg Punske, FHWA (email) and signed copy
Ed Woolford, FHWA (email)
Carlos Machado, FHWA
Merrell Jolley, UDOT
Betsy Herrmann, U.S. Fish and Wildlife Service (email)
Jason Gipson, U.S. Army Corps of Engineer (email)



EXHIBIT D

Central Utah Water Conservancy District's Comment on the DEIS;
U.S. Army Corps of Engineers Comments on Functional Assessment;
U.S. Fish and Wildlife Concurrence Letter